

HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SONIA JOSEPH, individually and as
Special Administrator of the ESTATE OF
GIOVONN JOSEPH-McDADE, and
GIOVANNI McDADE, individually,

Plaintiffs,

v.

CITY OF KENT, a Washington
municipality; CITY OF KENT POLICE
DEPARTMENT; WILLIAM DAVIS;
MATTHEW RAUSCH; and
JOHN DOES 1-10,

Defendants.

No. 2:20-cv-00771-BJR

DECLARATION OF KAITLIN T.
WRIGHT IN SUPPORT OF
PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

I, Kaitlin T. Wright, declare as follows:

1. I am an attorney at the law firm of Schroeter, Goldmark, & Bender, and counsel for Plaintiffs in the above-referenced action. I make this statement to identify and authenticate the exhibits submitted in support of Plaintiffs' Response to Defendants' Motion for Summary Judgment.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs' First Set of Requests for Admissions to Defendants and Responses Thereto;

1 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Kent Police
2 Department Report of Officer Thompson, JJ, dated 1/3/16, Supp. No. 0002;

3 4. Attached hereto as **Exhibit 3** is a true and correct copy of the Compelled
4 Statement of Matthew Rausch at Joseph-McDade;

5 5. Attached hereto as **Exhibit 4** is a true and correct copy of the Des Moines Police
6 Department Follow Up Continuation, Officer Reporting: F. Gendreau, July 21, 2017;

7 6. Attached hereto as **Exhibit 5** is a true and correct copy of Affidavit of Bianca
8 Fashaw;

9 7. Attached hereto as **Exhibit 6** is a true and correct copy of the Fee Billing
10 Records of Keating, Bucklin & McCormack, Inc., P.S.;

11 8. Attached hereto as **Exhibit 7** is a true and correct copy of the Photograph of the
12 ARCO AM/PM gas station when the decedent was initially observed by Officer Rausch;

13 9. Attached hereto as **Exhibit 8** is a true and correct copy of the CAD Transcript:
14 Detailed History for Police Incident #KP170044526 as of 07/12/2017;

15 10. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the
16 Transcript of Inquest Proceedings, Vol. II, Dec. 12, 2017;

17 11. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the
18 City of Kent Police Department Annual Report 2017;

19 12. Attached hereto as **Exhibit 11** is a true and correct copy of the Compelled
20 Statement of William Davis;

21 13. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts of the
22 Statement of AnnaMaria K. Decker;

1 14. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts from the
2 Transcript of Inquest Proceedings, Vol. III, Dec. 13, 2017;

3 15. Attached hereto as **Exhibit 14** is a true and correct copy of a map of the pursuit
4 route;

5 16. Attached hereto as **Exhibit 15** is a true and correct the Kent PD Policy #15.50
6 “Motor Vehicle Pursuits”;

7 17. Attached hereto as **Exhibit 16** is a true and correct photograph depicting
8 Giovonn McDade’s vehicle after impact;

9 18. Attached hereto as **Exhibit 17** is a true and correct copy of video clips of Kent
10 Police Department Reenactment Video with Devonte Cheeks at 6:59, 7:19, 14:43, 8:22, and
11 12:04. submitted to the Court via email “sharefile”;

12 19. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts from the
13 Transcript of Inquest Proceedings, Vol. I, Dec. 11, 2017;

14 20. Attached hereto as **Exhibit 19** is a true and correct copy of a photograph of
15 Officer Rausch’s patrol vehicle with detached push bar;

16 21. Attached hereto as **Exhibit 20** is a true and correct copy of the Autopsy Report,
17 King County Medical Examiner, Dr. Timothy Williams;

18 22. Attached hereto as **Exhibit 21** is a true and correct copy of the Kent PD Policy
19 #15.130 “Forcible Stopping”;

20 23. Attached hereto as **Exhibit 22** is a true and correct copy of the Kent PD Policy
21 #3.10 (revised October 2, 2014);

22 24. Attached hereto as **Exhibit 23** is a true and correct copy of the Kent PD Policy
23 #3.80 (revised March 8, 2017);

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

SCHROETER, GOLDMARK & BENDER

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CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing and submitted courtesy copies via email to the following:

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☐ Via Facsimile
☒ Via First Class Mail
☐ Via Messenger
☒ Via Email
☐ Via Process Service

*Counsel for Defendants City of Kent, City of
Kent Police Department, William Davis, and
Matthew Rausch*

DATED this 12th day of November, 2020, at Seattle, Washington

s/ Matthew Gonyea

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